



ALSA

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Rodolfo VASQUEZ-Gonzalez,

Defendant.

Mag. Case No. '07 MJ 89 18

COMPLAINT FOR VIOLATION OF

Title 8, U.S.C., Section 1324(a)(1)(A)(iii)  
Harboring Illegal Alien and  
Title 18, U.S.C., Section 2, Aiding &  
Abetting

The undersigned complainant being duly sworn states:

On or about November 8, 2007, within the Southern District of California, defendant Rodolfo VASQUEZ-Gonzalez, knowing or in reckless disregard of the fact that an alien, namely, Lizbeth BOJORQUEZ-Salazar, had come to, entered or remained in the United States in violation of law, did conceal, harbor or shield from detection or attempt to conceal, harbor or shield from detection such alien in any place, including any building located at 739 First Street, Apartment A, Calexico, California, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii) and Title 18, United States Code, Section 1324(a)(2)(B)(iii) and Title 18, United States Code, Section 2, Aiding and Abetting..

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

MICHAEL MIKUSKI  
SENIOR BORDER PATROL AGENT

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 9<sup>th</sup> DAY  
OF NOVEMBER 2007.

PETER C. LEWIS  
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Rodolfo VASQUEZ-Gonzalez

4 STATEMENT OF FACTS

5 The complainant states that this complaint is based upon statements in the investigative  
6 reports by the apprehending officer, Border Patrol Agent J. Arroyo, on November 8, 2007,  
7 Rodolfo VASQUEZ-Gonzalez, the defendant, a United States Citizen was apprehended in  
8 Calexico, California, as he aided and abetted one illegal alien in violation of law.

9 At approximately 3:20 a. m., while Agent Arroyo was conducting line watch duties east  
10 of the Calexico, California, Port of Entry, observed an individual, later identified as Lizbeth  
11 BOJORQUEZ-Salazar, enter illegally through a hole in the International border fence. Agent  
12 Arroyo observed as another individual, later identified as Rodolfo VASQUEZ-Gonzalez,  
13 verbally and using his hands, signaled BOJORQUEZ to run into Apartment A, 739 First Street,  
14 Calexico. Agent Arroyo identified himself as a U. S. Border Patrol Agent and ordered  
15 VASQUEZ and BOJORQUEZ to stop. Agent Arroyo was able to apprehend BOJORQUEZ.  
16 VASQUEZ ran into Apartment A, 739 First Street, Calexico. Agent Arroyo conducted a field  
17 interview with BOJORQUEZ and determined BOJORQUEZ was a native and citizen of Mexico  
18 illegally in the United States. BOJORQUEZ was placed under arrested.

19 Agent Arroyo waited outside Apartment A, 739 First Street, Calexico. After waiting for a  
20 short while VASQUEZ came out of the apartment and was placed under arrested.

21 Record checks revealed VASQUEZ had been arrested for alien numerous times for  
22 smuggling and has an extensive criminal history.

23 Material Witness Lizbeth BOJORQUEZ-Salazar admitted to being in the United States  
24 illegally. BOJORQUEZ stated arrangement were made to pay \$2,500.00 to a smuggler in  
25 Mexicali, Baja California, Mexico, known as "Nengo" for her to be smuggled into the United  
26 States. BOJORQUEZ stated she crossed illegally into the United States by crawling through a  
27 hole on the border fence. BOJORQUEZ stated that when she arrived at the hole in the fence and  
28 "Nengo" pointed out to her where VASQUEZ was standing and told her she should run to  
29 VASQUEZ and get inside VASQUEZ's apartment. BOJORQUEZ stated when she was going

1 thru the hole in the fence, VASQUEZ yelled at her several times to run, also gesturing for her to  
2 run towards him and go inside the apartment. BOJORQUEZ was shown a six pack-photo line-up  
3 and positively identified VASQUEZ as the smuggler telling her to run into his apartment.

4 The complainant states that the names of the Material Witnesses are as follows:

<u>NAME</u>	<u>PLACE OF BIRTH</u>
Lizbeth BOJORQUEZ-Salazar	Mexico

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8 Further, complainant states that Lizbeth BOJORQUEZ-Salazar, is a citizen of a country  
9 other than the United States; that said alien has admitted that she is deportable; that her testimony  
10 is material, that it is impracticable to secure her attendance at the trial by subpoena; and that she  
11 is a material witnesses in relation to this criminal charge and should be held or admitted to bail  
12 pursuant to Title 18, United States Code, Section 3144.  
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